

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**DECLARATION OF MILES EHRLICH
IN SUPPORT OF PLAINTIFF
WAYMO'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF JOINT PRETRIAL
FILINGS (Docket No. 1724)**

Document	Portion to Be Filed Under Seal	Designating Party
Appendix B to Joint Proposed Pretrial Order	Highlighted Portions	Anthony Levandowski (red highlighting)
Joint Proposed Jury Instructions	Highlighted Portions	Anthony Levandowski (red highlighting)

3. Mr. Levandowski seeks to maintain the confidentiality of the red highlighted portions of Appendix B to the Joint Proposed Pretrial Order. The red highlighted portions reflect confidential and sensitive information regarding Mr. Levandowski's business entities that are wholly unrelated to this litigation; therefore, he requests that the red highlighted portion of this document remain under seal.

4. Mr. Levandowski does not assert that the red highlighted portions of the Joint Proposed Jury Instructions merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in Berkeley, California, on September 25, 2017.

Date: September 25, 2017

Respectfully submitted,

/s/ Miles Ehrlich

Miles Ehrlich
Ramsey & Ehrlich LLP

*Counsel for Non-Party Anthony
Levandowski*